Illinois Commerce Commission

Public Act 102-0662 Implementation

Electric Utility Performance and Tracking Metrics

Comments of Members of the Illinois Clean Jobs Coalition

Members of the Illinois Clean Jobs Coalition submit the following comments, which identify the performance and tracking metrics, objectives, and concerns that are priorities to each of the following Illinois Clean Jobs Coalition Members represented in these comments: Elevate, Richard Ellerbrake, Union of Concerned Scientists, Richard Stuckey, Metro East Green Alliance, Faith in Place, IPA/CIHCA, Greater Highland Area Concerned Citizens, Climate Reality Chicago, and Advanced Energy Economy. The importance of each issue identified below is not ranked in sequential order; rather these comments reflect the varied views of the listed organizations. The identified issues generally track the statutory language in Public Act 102-0662 regarding metrics applicable to utilities that choose the multi-year rate plan option.

I. Reliability in EJ and equity investment eligible communities

   a. Location of interruptions.

   b. Number of customers that experience power interruptions.

   c. Location of interruptions vs. overall averages.

   d. Timeliness of power restoration.

   e. Percentage reduction in outages measured by SAIDI and SAIFI by zip code.

II. Peak load reduction

   a. Alignment of clean generation with system peaks.

   b. Reducing total energy used during peak hours/flattening load curve.

i. Concern about the impact of TOU programs in low-income communities.

c. Number of customers benefiting from demand response programs, potentially by zip code, to incent the utility to market and do outreach to under-subscribed communities.

d. Measure participation in demand response programs by zip code, to incent the utility to market and do outreach to under-subscribed communities.

III. Address the barriers to diverse contractor participation in professional services

a. Measure based on incremental increases in achieving the goal.

i. CEJA's Contractor Incubator and Primes Contractor Accelerator are intended to help with this, but the utility should take those programs' input into their operations and their work with contractors.

b. Number of diverse contractors providing professional services.

c. Utilizing organizations and committees from those communities to monitor and report on goal achievement.

i. CEJA will have a robust contractor development ecosystem. ICC should build in ties to incentivize working with current and alumnae participants in the contractor incubators, the prime contractor accelerator and contractors tapping the Jobs and Justice seed capital fund.

d. The ICC's certification processes for DG Installers, EE Installers, etc. could be made a bit less opaque.

e. Align demographics of contractors to the demographics in the utility's service territory.

i. CEJA's Contractor Incubator and Primes Contractor Accelerator are intended to help with this, but the utility should take those programs' input into their operations and their work with contractors.
ii. Create better awareness and more access.
iii. Measure based on incremental increases in achieving the goal.
iv. Utilities should partner with community outreach organizations to publicize opportunities and offer onboarding workshops in areas where contractor demographics don't reflect the community.
v. Outreach through education on churches and schools.

f. Programs to establish long-term mentoring relationships that develop and remove barriers to access for diverse and underserved contractors
    i. CEJA's Contractor Incubator and Primes Contractor Accelerator are intended to help with this, but the utility should take those programs' input into their operations and their work with contractors, and the metric should incentivize participation in that program.
    ii. Measure based on incremental increases in achieving the goal.
g. Programs to provide solutions, resources, and tools to address barriers of entry for diverse and underserved contractors
    i. Create a web portal for RFP submissions that facilitates and simplifies the process. CEJA's Contractor Incubator and Primes Contractor Accelerator are intended to help with this, but the utility should take those programs' input into their operations and their work with contractors.

ii. Subsidize diverse and underserved contractors startups and growth. Give diverse and underserved contractors preference in hiring even if they are not the low cost provider and provide mentors to d/u contractors.

iii. Work with the CEJA contracting ecosystem to make sure training and support as well as capital is available to address the above barriers.

iv. ICC rulemaking to authorize ICC or utilities to speed up this sort of vetting and red tape.

h. Programs with contracts over $1,000,000, winning bidders must demonstrate a subcontractor development or mentoring relationship with at least one of their diverse subcontracting partners

i. Conduct an annual audit of each utility's subcontractor relationships in this category.

ii. Take input from CEJA's Contractor Incubator and Primes Contractor Accelerator programs into utility operations and their work with contractors.

iii. Prescribed reporting data and format.

iv. The mentoring time and cost shall be taken into account in the creation of RFP and shall include a structured and measured plan by the prime contractor to increase the capabilities of the subcontractor in their proposed scope.

v. The metric shall include reporting on all supplier diversity programs by goals, program results, demographics and geography, with separate

reporting by category of minority-owned, female-owned, veteran-owned, and disability-owned business enterprise metrics.

IV. Affordability

a. Demonstration that all customers' bills are limited to 6% of gross income (commonly used as the threshold for energy burden) or some other percentage.
b. Reducing number of customers in arrears and/or disconnected.
c. Number of eligible customers enrolled in affordability/assistance programs.
d. Average monthly bill for all residential and/or low-income customers.
e. Customer savings from participating in efficiency, dynamic pricing, and other programs.
f. Reduction in total arrearages by zip code.
g. Should have a different affordability measure for lower-income households, households in equity investment eligible communities, or household in environmental justice communities.
h. Measure energy savings or load reductions for customers beyond an established baseline.
i. Increase participation rates of eligible customers in utility programs.
j. Zip code is too coarse to measure affordability – it instead should be measured by census tracts.

V. Credit and collection policies

a. Should be adopted to reduce disconnections, tracked separately for low income customers and non-low income customers overall to ensure disconnections, late fees, or arrearages are equitable.

b. Measuring by zip code is too coarse a measurement. It should instead be tracked by census tracts.

c. Transparency of data is critical. In Peoria many felt the high number of disconnections could have been avoided if the city had been notified about pending disconnects, a past practice that has been discontinued by Ameren.

d. Measure average arrearage in each ZIP code compared to the ZIP code's net income.

VI. Affordable rate options

a. Energy efficiency.

b. Demand response.

c. Time of use rates for delivery and supply.

    i. May not be appropriate for low-income residents.

d. Real-time pricing rates for supply.

e. Reduced taxes for dd/u customers.

f. Reduce flat charges for delivery for dd/u.

g. Income based real-time pricing rates for supply.

h. Concepts like percentage of income payment programs should be explored.

VII. Net Metering

a. Number of net meter users.

b. Amount kWh returned to grid.

c. Amount pulled from grid as percent of total used.

d. Pay for net kWh exported at same rate as purchased electricity.

e. Rate of cost of electricity used and electricity made should be 1 to 1.

f. Upcoming changes in delivery and supply volumetric rates (in coming months and coming years) should be clearly communicated, perhaps on the utility's website, so that prospective solar customers can make an informed decision.

VIII. Maximizing the benefits of grid modernization and clean energy for ratepayers

a. Online portal to enable customers to access all their online services such as account management which includes moving or stopping services, completing a payment arrangements, submitting a high bill inquiry, signing up for preferences and outage (planned and unplanned) information, and applying for new and existing DER programs.

b. Public facing utility scorecard on metrics progress, Percent of benefits from all investments that accrue to EJ and equity investment eligible communities

c. Percent of benefits from all investments that accrue to EJ and equity investment eligible communities, clean energy investments and/or total dollars invested in EJ and equity investment eligible communities.

d. Clean energy investment impacts on jobs/contracting, on air quality, on bill reduction and on avoided 20th century technology investments should all be tracked in an attempt to quantify the benefits of distributed grid investment.

IX. Improve customer access to utility system information according to consumer demand and interest

a. Development of an online customer portal.

b. Post data on ICC website or utility website.

c. Include relevant information in bills at least quarterly.

d. Find out from actual customers -- low-income, residential, commerical etc. -- what they actually want before designing any sort of portal or web site.

X. Customer service performance

a. Relative ranking of the electric utility, by a reputable third-party organization, in customer service satisfaction when compared to other similar electric utilities in the Midwest region.

b. Targeted outreach to customers eligible for specific rate options and low income assistance.

c. Abandoned call rate.

d. Number of complaints to utility and/or ICC.

e. Total time spent waiting to talk to a customer service representative.

f. This metric should be penalty-only. Residential and commerical customers should receive the same service levels.

g. Customer service metrics should differ by zip code.

XI. Interconnection requests

a. Total number of days to interconnect a solar system.

b. Total MW of distributed energy resources connected to the grid.

c. Number of customers on a net metering tariff.

d. Rate options available to customers with distributed energy resources.

e. Total MW of distributed energy resources connected to the grid.